

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**CASE NO. 24-20466-CR-SCOLA**

**UNITED STATES OF AMERICA**

**v.**

**TIRON ALEXANDER,**

**Defendant.**

\_\_\_\_\_ /

**UNITED STATES OF AMERICA’S WITNESS AND EXHIBIT LIST**

The United States of America respectfully submits the following witness and exhibit list for the trial set to begin April 21, 2025, in accordance with this Court’s trial order, DE 17. The Government submits this proposed list in light of the Court ordering that this matter will proceed to calendar call on April 15 at 9am, but the Government requests leave to add exhibits and witnesses as necessary—and in particular, to provide individual names as to the corporate entities listed once a person from those companies is designated to be the witness present at trial. These placeholder designations are necessary because of the late notice the defense provided regarding its desire to proceed to trial, as set forth in the Government’s Motion to Continue, DE 22.

Dated: April 15, 2025

Respectfully submitted,

By:

HAYDEN P. O’BYRNE  
UNITED STATES ATTORNEY

/s/ Zachary A. Keller  
ZACHARY A. KELLER  
Assistant United States Attorney  
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**Witness and Exhibit List**

**v.**

**TIRON ALEXANDER,**

**Defendant.**

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**WITNESS AND EXHIBIT LIST – TRIAL PHASE ONE**

Presiding Judge: The Honorable Robert N. Scola					AUSA: Zachary A. Keller Michael Shepherd	Defendant’s Attorney: Eboni Blenman Paul Carson
USA No.	Def. No.	Date Offered	Date Admitted	Witness	Court Reporter:	Courtroom Deputy: Jacob Hasbun
1.					Gaden Piant, Transportation Security Administration (“ATF”) Special Agent	
2.					Constantine Juranis, Spirit Airlines	
3.					Mark Peitz, Spirit Airlines	
4.					Raymond James, Spirit Airlines	
5.					American Airlines Representative	
6.					Delta Airlines Representative	
7.					Frontier Airlines Representative	
8.					Allegiant Airlines Representative	
9.					Avelo Airlines Representative	
10.					ExpressJet Airlines Representative	

Presiding Judge: The Honorable Robert N. Scola					AUSA: Zachary A. Keller Michael Shepherd	Defendant's Attorney: Ebony Blenman Paul Carson
USA No.	Def. No.	Date Offered	Date Admitted	Witness	Court Reporter:	Courtroom Deputy: Jacob Hasbun
1.					Defendant Spirit Airlines Travel Composite: 02-23-2019	
2.					Defendant Spirit Airlines Travel Composite: 06-02-2019	
3.					Defendant Spirit Airlines Travel Composite: 07-02-2019	
4.					Defendant Spirit Airlines Travel Composite: 08-14-2019	
5.					Defendant Spirit Airlines Travel Composite: 08-18-2019	
6.					Defendant Spirit Airlines Travel Composite: 09-24-2019	
7.					Defendant Spirit Airlines Travel Composite: 07-22-2020	
8.					Defendant Spirit Airlines Travel Composite: 08-25-2020	
9.					Defendant Spirit Airlines Travel Composite: 09-09-2020	
10.					Defendant Spirit Airlines Travel Composite: 03-01-2021	
11.					Defendant Spirit Airlines Travel Composite: 05-05-2021	
12.					Defendant Spirit Airlines Travel Composite: 07-06-2021	
13.					Defendant Spirit Airlines Travel Composite: 07-31-2021	
14.					Defendant Spirit Airlines Travel Composite: 09-06-2021	
15.					Defendant Spirit Airlines Travel Composite: 12-31-2021	
16.					Defendant Spirit Airlines Travel Composite: 02-26-2022	
17.					Defendant Spirit Airlines Travel Composite: 06-07-2022	
18.					Defendant Spirit Airlines Travel Composite: 11-10-2022	
19.					Defendant Spirit Airlines Travel Composite: 01-18-2024	
20.					Defendant Spirit Airlines Travel Composite: 01-29-2024	
21.					Defendant Spirit Airlines Travel Composite: 02-10-2024	
22.					Defendant Spirit Airlines Travel Composite: 03-18-2024	
23.					Defendant Spirit Airlines Travel Composite: 03-19-2024	

Presiding Judge: The Honorable Robert N. Scola					AUSA: Zachary A. Keller Michael Shepherd	Defendant's Attorney: Eboni Blenman Paul Carson
USA No.	Def. No.	Date Offered	Date Admitted	Witness	Court Reporter:	Courtroom Deputy: Jacob Hasbun
24.					Defendant Spirit Airlines Travel Composite: 03-26-2024	
25.					Defendant Spirit Airlines Travel Composite: 06-14-2024	
26.					Defendant Spirit Airlines Travel Composite: 08-25-2024	
27.					Defendant Spirit Airlines Travel Composite: 09-08-2024	
28.					Defendant Spirit Airlines Travel Composite: 09-14-2024	
29.					Defendant Spirit Airlines Travel Composite: 09-29-2024	
30.					Defendant Spirit Airlines Travel Composite: 09-29-2024	
31.					Defendant Spirit Airlines Travel Composite: 10-01-2024	
32.					Defendant Spirit Airlines Travel Composite: 10-15-2024	
33.					Defendant Spirit Airlines Travel Composite: 10-16-2024	
34.					Spirit Airlines Defendant Travel Composite	
35.					American Airlines Defendant Cardholder Summary	
36.					Defendant DFW Airport Still Photo	
37.					Defendant Florida DAVID	
38.					Defendant Georgia Driver's License	
39.					Defendant Texas Driver's License	
40.					Southwest Airlines Composite Defendant Travel Records	
41.					United Airlines Composite Defendant Travel Records	
42.					Composite Screenshots of Spirit Airlines Travel Portal	

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on April 15, 2025, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF.

/s/ Zachary A. Keller

Zachary A. Keller

Assistant United States Attorney